

CRAVATH, SWAINE & MOORE LLP

JOHN W. WHITE RICHARD W. CLARY STEPHEN L. GORDON ROBERT H. BARON DAVID MERCADO CHRISTINE A. VARNEY PETER T. BARBUR THOMAS G. RAFFERTY MICHAEL S. GOLDMAN RICHARD HALL JULIE A. NORTH ANDREW W. NEEDHAM STEPHEN L. BURNS KATHERINE B. FORREST KEITH R. HUMMEL DAVID I KAPPOS DANIEL SLIFKIN ROBERT I. TOWNSEND, III WILLIAM J. WHELAN, III PHILIP J. BOECKMAN WILLIAM V. FOGG FAIZA J. SAEED RICHARD J. STARK

THOMAS E. DUNN MARK I. GREENE DAVID R. MARRIOTT MICHAEL A. PASKIN ANDREW J. PITTS MICHAEL T. REYNOLDS ANTONY L. RYAN GEORGE E. ZOBITZ GEORGE A. STEPHANAKIS DARIN P. MCATEE GARY A. BORNSTEIN TIMOTHY G. CAMERON KARIN A. DEMASI DAVID S. FINKELSTEIN DAVID GREENWALD RACHEL G. SKAISTIS PAUL H. ZUMBRO ERIC W. HILFERS GEORGE F. SCHOEN ERIK R. TAVZEL CRAIG F. ARCELLA DAMIEN R. ZOUBEK LAUREN ANGELILLI TATIANA LAPUSHCHIK

Worldwide Plaza 825 Eighth Avenue New York, NY 10019-7475

TELEPHONE: +1-212-474-1000 FACSIMILE: +1-212-474-3700

CITYPOINT
ONE ROPEMAKER STREET
LONDON ECZY 9HR
TELEPHONE: +44-20-7453-1000
FACSIMILE: +44-20-7860-1150

writer's direct dial number +1-212-474-1760

writer's email address mpaskin@cravath.com

ALYSSA K. CAPLES JENNIFER S. CONWAY MINH VAN NGO KEVIN J. ORSINI MATTHEW MORREALE JOHN D. BURETTA J. WESLEY EARNHARDT YONATAN EVEN BENJAMIN GRUENSTEIN JOSEPH D. ZAVAGLIA STEPHEN M. KESSING LAUREN A. MOSKOWITZ DAVID J. PERKINS JOHNNY G. SKUMPIJA J. LEONARD TETI. II D. SCOTT BENNETT TINGS CHEN CHRISTOPHER K. FARGO KENNETH C. HALCOM DAVID M. STUART AARON M. GRUBER O. KEITH HALLAM, III OMID H. NASAB DAMARIS HERNÁNDEZ

JONATHAN J. KATZ
MARGARET SEGALL D'AMICO
RORY A. LERARIS
KARA L. MUNGOVAN
NICHOLAS A. DORSEY
ANDREW C. ELKEN
JENNY HOCHENBERG
VANESSA A. LAVELY
G.J. LIGELIS JR.
MICHAEL E. MARIANI
LAUREN R. KENNEDY
SASHA ROSENTHAL-LARREA
ALLISON M. WEIN

SPECIAL COUNSEL SAMUEL C. BUTLER

OF COUNSEL MICHAEL L. SCHLER CHRISTOPHER J. KELLY

December 18, 2019

<u>Petersen Energía Inversora, S.A.U. et al. v. Argentine Republic and YPF S.A.,</u> No. 15-cv-02739 (LAP); <u>Eton Park Capital Management, L.P. et al. v. Argentine Republic and</u> YPF S.A., No. 16-cv-8569 (LAP)

Dear Judge Preska:

We write on behalf of defendant YPF S.A. ("YPF") in the above-captioned actions in further support of the requested extension until March 16, 2020 to reply to Plaintiffs' Opposition to Defendants' Joint Motion to Dismiss for *Forum Non Conveniens* (*Petersen* ECF No. 125; *Eton Park* ECF No. 66). In addition to the points made in Argentina's reply, YPF writes to clarify the record with respect to Plaintiffs' statement that YPF "has had no change of control". In fact, Guillermo Nielsen has been appointed as the new President of YPF (equivalent of board chair), and there have been other changes in the Board of Directors. Among their many other new management and oversight responsibilities, Mr. Nielsen and the rest of the board will need additional time to get up to speed on this important litigation and provide us with direction on how to proceed.

We thank Your Honor for the Court's attention to this matter.

Respectfully Submitted,

/s/ Michael A. Paskin

Michael A. Paskin

Honorable Loretta A. Preska
United States District Court for the Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

VIA ECF

Copies to: All Counsel of Record via ECF